

**COPY**  
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**IN RE: SUBPOENA SERVED ON  
PHARM/DUR, INC.**

**MISC. CASE NUMBER**

**Medical Card System, Inc., MCS Life  
Insurance, Inc., and  
MCS Advantage, Inc.  
Petitioners**

**U. S. DISTRICT COURT - DE  
MISC. CASE # 08 - 08**

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2008 JAN 23 PM 1:38

**MOTION FOR ADMISSION *PRO HAC VICE***

**TO THE HONORABLE COURT:**

Pursuant to Rule 83.5 of the Local Rules of the United States District Court for the District of Delaware (the "Local Rules"), request is hereby made that Carmen Edith Torres be permitted to appear and participate in this action as counsel for the named petitioners, Medical Card System, Inc., MCS Life Insurance, Inc., and MCS Advantage, Inc. In support of this application the undersigned counsel states as follows:

1. That Carmen Edith Torres is a member in good standing of the U.S. District Court for the District of Puerto Rico (admitted on January 28, 2005, Bar No. 222313); U.S. Court of Appeals for the First Circuit (admitted on March 9, 2006, Bar No. 111116); and the Puerto Rico Supreme Court (admitted on January 30, 2002, Bar No. 15,339).
2. The proposed admittee is not a member of the Delaware bar and does not maintain any law office in Delaware.

3. That Ms. Torres is a partner in the LAW OFFICES OF PEDRO ORTIZ ÁLVAREZ, PSC, with offices located at G-8 O'Neill Street, San Juan, Puerto Rico 00931.
4. This is the first time the proposed admitte has requested admission in a Pro Hac Vice basis before this Court, and the sole purpose of this request is to file a petition to quash or modify a subpoena duces tecum ancillary in a case pending before the U.S. District Court for the District of Puerto Rico.
5. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction, and does not have any complaints for unethical misconduct, disciplinary proceedings or criminal charges that are currently pending before any court of jurisdiction.
6. The proposed admittee is familiar with the Code of Professional Responsibility, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure and the Local Rules of this Court, and understands she shall be subject to the disciplinary jurisdiction of this Court.
7. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.
8. That currently the undersigned is seeking the assistance of a counsel admitted to practice before this Court that could act as designee on behalf of the applicant. Hence, is requested that pursuant to Local Rule 83.5 (d),

a 30-day period from the time of the filing of the instant motion, be granted to obtain a local counsel.

**WHEREFORE**, the undersigned attorney, Carmen Edith Torres, Esq., respectfully requests this Honorable Court to allow her admission pro hac vice to appear in these proceedings pursuant to the Local Rules.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 21<sup>st</sup> day of January, 2008.

**LAW OFFICES OF PEDRO ORTIZ ÁLVAREZ, PSC**

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